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May 24, 2024

VIA ECF

Judge Natasha C. Merle
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Mertz v. Wells Fargo Bank, N.A., et al.
Docket No. 2:22-cv-03924-NCM-SIL
R&H File No: 805987

Dear Judge Merle:

We represent Wells Fargo Bank, N.A. in this matter. We are writing to request a two-day extension to file a pre-motion letter in advance of a Motion for Summary Judgment.

The original deadline to file the pre-motion letter as set by Magistrate Locke's May 1, 2024 Order was May 22, 2024. This request is made because undersigned counsel accidentally calendared the deadline for May 29, 2024, which is the deadline for plaintiff's response.

No prior requests have been made. Plaintiff's counsel graciously agreed to the two day extension. We propose that this extension would make plaintiff's counsel's response to the pre-motion letter due on May 31, 2024.

In an abundance of caution, and in light of the upcoming holiday weekend, we will file the pre-motion letter today.

Very truly yours,

RAWLE & HENDERSON LLP

By:

Diane B. Carvell

DBC/mms

cc: Richard Lavorata, Jr., Esquire